225930 CRIGINAL

NAME:

Crouse-Hinds Company, Inc./Cooper Industries, Inc.

SITE AFFILIATION:

Generator

MAILING ADDRESS:

Cooper Industries, Incorporated

1001 Fannin, Suite 4000

P.O. Box 4446 Houston, TX 77210 (713) 739-5400

CONTACT:

W. Anne Lemelle

Legal Assistant, Environmental

Cooper Industries, Inc.

(713) 739-5655

PERTINENT DOCUMENTS:

CII-01 • 1995 Dun & Bradstreet Report on Cooper Industries, Inc.

CII-02 • CERCLA Section 104(e) Information Request Letter [104(e) letter] response from Cooper Industries, Inc., dated June 29, 1994.

CII-03 • 104(e) letter addressed to Crouse Hinds Company, dated May 20, 1994.

CII-04 • Crouse-Hinds Company Purchase Order, dated January 24, 1977.

CII-05 • Portions of Deposition of Harry Sutton, conducted September 9, 1986.

CII-06 • Attachment 1 of this Draft Findings Report.

TYPE OF OPERATIONS:

Between 1977 and 1979, Crouse-Hinds Company (Crouse-Hinds) manufactured electrical lighting, plugs, receptacles, enclosures, and fittings for application in severe and explosive environments. Operations included iron and

aluminum casting, machining, plating, painting, plastics molding, assembly, packaging, warehousing, and shipping (CII-01, CII-02).

CORPORATE HISTORY:

In 1981, Crouse-Hinds, a New York Corporation, was acquired by Cooper Industries, Inc., (Cooper Industries) and subsequently became a Cooper Industries unincorporated division in 1983 (CII-01, CII-02). Cooper Industries was incorporated on January 8, 1919, in the State of Ohio (CII-01, CII-02).

RELEVANT INFORMATION:

In response to EPA's May 20, 1994, 104(e) letter, Cooper Industries stated that between 1976 and 1979, Crouse-Hinds utilized a number of hazardous substances during manufacturing operations. Such substances included ester resins, phenolic isocyanates, cutting oils, hydraulic fluids, lubricants and paraffinic solvents. Cleaners used to wash metals consisted of hydrochloric acid, sulfuric acid, phosphoric acid, nitric acid, trisodium phosphate, and sodium metasilicate (CII-02, CII-03).

Crouse-Hinds indicated that painting operations used a variety of waterborne and solvent based paints and thinners, including xylene, toluene, acetone, methyl ethyl ketone, and alcohols, and spray washes contained phosphate and chromium (CII-02).

Plating operations used zinc, zinc chloride, ammonia hydroxide, chromium, glycol ether, and methanol. Plastics operations utilized styrene, methylene chloride, trichloroethane, acetone, and toluene (CII-02).

Cooper Industries did not explain its procedures for handling, storing and disposing of such wastes.

A Crouse-Hinds purchase order indicates that Northeast Oil Services, Inc., (Northeast Oil) was contracted by Crouse-Hinds from March 15, 1977 to March 15, 1978, to remove and transport wastes from Crouse-Hinds' oil recovery building. The purchase order further indicates that that purchase order replaces a previous year's purchase order for the same waste removal services (CII-04).

Crouse-Hinds' oil recovery building housed a 15,000 gallon American Petroleum Institute (API) gravity type oil/water separator. The wastewater was discharged to a Onondaga County Metropolitan Treatment Plant, while the oil, originally generated from the machining of metal parts throughout the Crouse-Hinds facility, would be stored in a 1,500 gallon tank and removed by Northeast Oil. Cooper Industries contends that the only substance stored in the oil skimmed from the surface of the API oil/water separator (CII-02).

Cooper Industries also stated that it has no records regarding Northeast Oil nor does it have any documentation or information regarding any other company Crouse-Hinds may have used to remove and/or transport waste from its facility. In addition, Cooper Industries stated that Crouse-Hinds employees have no recollection of waste pick-ups by Northeast Oil (CII-02).

Documents which may have provided information regarding Crouse-Hinds' disposal practices as well as their use of Northeast Oil were destroyed approximately ten (10) years after their generation pursuant to Cooper Industries document retention policy (CII-02).

Harry Sutton, an employee of Northeast Oil, identified Crouse-Hinds as a customer of Northeast Oil's Syracuse facility transporters (CII-05).

RECOMMENDATIONS:

Several of the types of wastes generated during Crouse-Hind's operations were also detected at the Site, including sodium hydroxide, waste oil, methylene chloride, chromium, zinc, toluene, xylene, and ester resins (CII-06, pp. 45-49).

EPA should send a follow-up 104(e) letter to Cooper Industries and request information concerning Crouse-Hinds procedures for disposal of hazardous wastes generated during operations.

ASSOCIATED PARTIES:

Cooper Industries, Incorporated Northeast Oil Services, Incorporated